

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT

Comments on Hydro Aluminum North America Inc., Draft Conditional Major Air Quality Permit submitted by Rita Arguello.

Conditional Major Permit

1. Page 2 of 33. EP 01 Aluminum Reverberatory Melting Furnace/Operating Limitations, Compliance Demonstration – “Report any time when the furnace is in operation without the control device and, report any time when scrap, other than clean charge as defined by 40 CFR 63.1503 is charged to the furnace without the control device operating.”

Division’s response: The Division has revised the permit as suggested by the source and agreed to change the paragraph to “Report any time when scrap, other than clean charge as defined by 40 CFR 63.1503, is charged to the furnace when the control device is not operating.” However, it has been added “The permittee shall scrape the furnace clean of any flux or contaminants when they are moving to charging only clean charge. Records shall be kept in a log of cleaning operations and dates of the switch to clean charge.”

2. Page 13 of 33, EP 05(06) Dross Handling Testing Requirement: Condition 3.a “...the permittee shall perform stack testing ...”

Division’s response: The Division for Air Quality has removed the condition 3.a for EP 05(06).

3. Page 14 of 33. EP 05 (06), EP 05(06) Dross Handling, Specific Monitoring Requirements: 4.c. “The bag leak detection system must be equipped with an alarm system...”

Division’s response: The Division had the information of an existing bag leak detector but acknowledges your comment and has removed the condition 4.c. for EP 05(06).

4. Page 32 of 33, Alternative Operating Scenario Condition b.(a)(1)) – “...see the EPA memorandum...”, ...40 CFR is repeated..”

Division’s response: The Division has revised the permit as requested by the source and KDAQ agrees that the EPA memorandum dated on July 28, 2006 which provides guidance on clean charge cannot be incorporated into the permit. However, Hydro Aluminum is subject to U.S. EPA’s interpretation of its regulations. The Subcondition b.(a)(1) from the Alternative Operating Scenario, has been removed and corrected typo.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.